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MiCTA – *We Make Buying Easy!*
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www.mictatech.org, micta@mictatech.org

April 13, 2011

MiCTA POSITION STATEMENT ON LOCATION SPECIFIC E-9-1-1 DEADLINE

MiCTA is an association of non-profit colleges, universities, K-12 school systems, state, and local governmental units, health care providers, libraries, and other non-profit entities. Most of those entities have one or more types of multi-line phone systems. Consequently, most of those Michigan institutions are impacted by the deadline which was established by the Michigan Legislature that all multi-line phone systems must have locate specific E-9-1-1 capability by December 31, 2011. Even though that deadline date is only a few months away, the Michigan Public Service Commission has yet to promulgate the rules as to how this requirement is to be implemented. Consequently, because of the time it takes to comply, the cost of compliance, and the lack of rules, MiCTA believes that it is necessary to delay implementation by either amending the legislation to extend this deadline or by MPSC rule.

This issue arises because in 2007 the legislature amended the 9-1-1 law to require that any users of multi-line telephone systems install the necessary equipment and software to provide specific location information on a 9-1-1 call no later than December 31, 2011. This requirement was placed upon all multi-line telephone systems regardless of the system technology. The Michigan Public Service Commission was to promulgate rules under this new law describing how it was to be implemented. Although the Commission has held some informal meetings, as of this date, just a few months from the deadline, there are still no final rules that have been promulgated.

In 2010 and again this year, in order to raise awareness of this impending deadline we began to survey members with respect to the location specific E-9-1-1 requirement and the December 31, 2011 deadline. The survey response demographics are 71% K-12, 19% higher education and 10% health care, non-profits and government. Our survey results were very revealing. First, our survey identified that 72% of our Michigan members have one or more multi-line telephone systems. Second, the survey identified that 60% of our Michigan members were not familiar with the location specific E-9-1-1 identification requirement or the December 31, 2011 deadline. Some 84% of Michigan members indicated that their multi-line telephone system either did not comply with location specific E-9-1-1 requirements or they did not know if they complied. Only 16% reported that they thought they were in compliance as the survey date. More than 50% of our Michigan members did not know whether their multi-line phone system could be compliant by December 31, 2011. Significantly, only 12% of Michigan MiCTA members will not incur significant costs to comply with the location specific E-9-1-1 requirements. Finally, MiCTA's Michigan members responded that most do not receive emergency services from a private provider, but do rely upon the public 9-1-1 system.

Since the Michigan Public Service Commission still has not finalized rules as to how to implement this requirement, it is unlikely that many institutions, especially k-12, colleges and non-profits will be able to comply by the December 31, 2011 legislative deadline. In light of the situation, and given the fact that we are only a few months away from this deadline, MiCTA supports amending the current law to allow more time to comply with this location specific E-9-1-1 requirement.

Sincerely,

A handwritten signature in black ink that reads "John Sundstrom". The signature is written in a cursive, flowing style.

John Sundstrom
President, MiCTA



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March 28, 2011

Dear MiCTA Member,

One of MiCTA's roles is to monitor legislative and administrative actions that impact our members' telecommunications services. As you may know, the legislature did pass bill which will affect your organization if any of your buildings are over 40,000 square feet in size, or you have multiple buildings (e.g., most schools, hospitals, etc).

The legislation:

- ☐ requires all businesses that operate a multi-line telephone system inside one or multiple buildings, buildings that share a single street address, or are more than 40,000 sq. ft in size, install all necessary equipment and software to provide building, floor and room number information to their local Public Safety Answering Point (PSAP) that can localize a 9-1-1 caller to an area no greater than 7,000 square feet.
- ☐ applies regardless of the telephone technology currently in use
- ☐ takes effect January 1, 2012

We are resending the survey from last year to gather information about the current ability of member organizations to comply with the legislation. Efforts are underway to extend the required implementation period.

Your survey responses will help MiCTA determine how best to advocate for its membership on this issue. You have received this survey because you are listed as our contact for your organization, but the person who is most knowledgeable about or responsible for operating and maintaining your telephone system(s) should complete the survey. If you are not the appropriate respondent, please take a moment to forward this survey to the correct person in your organization. This survey is provided as a PDF form. Please complete the following survey questions, save the modified document and return it to me at E911@mictatech.org no later than **Friday, April 8, 2011**. Your prompt attention to and input on this matter is invaluable.

If you would be able to participate in a working group on this issue, please contact our office as soon as possible. It would also be helpful to contact your state legislators, regarding your organization's current status, as it relates to compliance with this legislation.

Sincerely,

John Sundstrom
President, MiCTA

1. Before you received this survey, were you familiar with the MPSC's proposed changes to Michigan's E911 identification requirements?
☐ Yes ☐ No ☐ Don't Know
2. Does your organization operate one or more multi-line telephone systems?
☐ Yes ☐ No ☐ Don't Know
3. Does your organization occupy multiple buildings that share a single street address?
☐ Yes ☐ No ☐ Don't Know
4. Are any of your buildings greater than 40,000 square feet?
☐ Yes ☐ No ☐ Don't Know
5. Does each telephone line in your current system fully comply with the new MPSC E911 rules?
☐ Yes ☐ No ☐ Don't Know
6. If your system is not compliant, will your system be compliant by December 31, 2011?
☐ Yes ☐ No ☐ Don't Know
7. Will your organization incur any significant expense to comply with this rule?
☐ Yes ☐ No ☐ Don't Know
8. Are emergency calls from your organization routed directly to your city/county 911 or does your organization have a private PSAP that provides police, fire and EMS services (all three) directly to your organization?
☐ County 911 ☐ Private PSAP ☐ Don't Know

If you would like more information about this rulemaking change as it develops, please provide your name and contact information in the spaces below:

First Name: _____ Last Name: _____ Organization: _____

Phone Number: _____ Email address: _____

PLEASE RETURN THIS SURVEY BY FRIDAY, APRIL 8, 2011 TO E911@mictatech.org

MEMORANDUM

April 12, 2011

To: Tim von Hoff
John Sundstrom

From: Victoria Valley

RE: E911 Survey Results 2011

Accompanying this memorandum are the results from your E911 survey. The survey was an eight-question instrument designed to determine the following:

- Awareness of administrative rulemaking regarding E-911 services in Michigan
- How many MiCTA members will be affected by the proposed rulemaking
- The status of compliance with the proposed rulemaking
- The likelihood that MiCTA members will be fully compliant by the effective date of the rule
- The likelihood that MiCTA members will incur significant cost to comply with the rule

The survey, issued in PDF form, was distributed on March 28, 2011 to all active MiCTA members of the 260 k-12, Higher Education Institutions (179 or 69% of Michigan MiCTA members) and organizations (81 or 31% of Michigan MiCTA Members) located in Michigan, regardless of size. Recipients were instructed to complete and return the survey by April 8, 2011. Recipients were also provided with the most recent draft of the proposed rules.

The survey yielded 58 usable responses. Three responses were discarded because the 2 respondents did not send the completed survey form and one respondent sent the survey in a print file that couldn't be opened. The effective response rate of the survey was 22.3% (22%). The most frequently received responses appear in bold text.

Question #1 was designed to measure the respondent's awareness of the proposed rulemaking. 58 respondents answered this question.

1. Before you received this survey, were you familiar with the MPSC's proposed changes to Michigan's E911 identification requirements?

Yes: 36%

No: 64%

Don't Know: 0%

Questions 2, 3 and 4 were designed to help the respondent identify whether the proposed rule applied to their organizations.

2. Does your organization operate one or more multi-line telephone systems? (58 responses)

Yes: 98%

No: 0%

Don't Know: 2%

3. Does your organization occupy multiple buildings that share a single street address? (58 respondents)

Yes: 49%

No: 50%

Don't Know: 1%

4. Are any of your buildings greater than 40,000 square feet? (58 respondents)

Yes: 76%

No: 16%

Don't Know: 8%

Question 5 was designed to test the respondent's current state of E-911 readiness.

5. Does each telephone line in your current system fully comply with the new MPSC E911 rules? (58 respondents)

Yes: 16%

No: 60%

Don't Know: 24%

Question 6 was designed to determine the respondent's willingness or ability to comply with the regulation prior to its effective date.

6. If your system is not compliant, will your system be compliant by December 31, 2011? (58 respondents)

Yes: 22%

No: 24%

Don't Know: 54%

Question 7 was designed to determine the financial impact of the proposed rule.
(58 respondents)

7. Will your organization incur any significant expense to comply with this rule?

Yes: 64%

No: 17%

Don't Know: 19%

Question 8 was designed to indicate that the PSAP exception to the rule will apply only if an organization provides its own first-response police, fire and EMS services. The one respondent who indicated that her organization has a private PSAP may not be clear on how emergency calls are routed, based upon the type of organization she was responding for.

8. Are emergency calls from your organization routed directly to your city/county 911 or does your organization have a private PSAP that provides police, fire and EMS services (all three) directly to your organization? (58 respondents)

County 911: 93%

Private PSAP: 1%

Don't Know: 6%

Total Survey DEMOGRAPHICS - Response DEMOGRAPHICS

K-12 Education: 49% (127) - - **71% (41)**

Higher Education: 20% (52) - - **19% (11)**

Health Care, Non-profit and Government: 31% (81) - - **10% (6)**

CONCLUSIONS:

- Approximately 64% of MiCTA members do not know of the proposed E-911 rulemaking, despite the fact that it applies to the majority of MiCTA members.
- Most MiCTA members, 84%, are not currently compliant with the proposed rule and will have to address the requirements within the next 18 months.
- The majority 84% (60% + 24%) of MiCTA members will not be or do not know if they will be compliant when the new regulation takes effect.
- Significantly, only 17% of MiCTA members **will not** incur significant costs to comply with the rule. 64% of respondents will positively incur

significant costs and 19% currently do not know if they will incur significant costs to comply with the proposed rule.

- Generally, respondents do not receive emergency services from a private provider. This is significant only because it indicates conclusively that even the largest university members do not qualify for the exception established by the rule and therefore will be required to comply.
- All respondents, regardless of their compliance status, indicated that they wanted to receive additional information on the rulemaking process from MiCTA.

MEMORANDUM

June 1, 2010

To: Tim von Hoff
John Sundstrom

From: Eileen Peck

RE: E911 Survey results

Accompanying this memorandum are the results from your E911 survey. The survey was an eight-question instrument designed to determine the following:

- Awareness of administrative rulemaking regarding E-911 services in Michigan
- How many MiCTA members will be affected by the proposed rulemaking
- The status of compliance with the proposed rulemaking
- The likelihood that MiCTA members will be fully compliant by the effective date of the rule
- The likelihood that MiCTA members will incur significant cost to comply with the rule

The survey, issued in PDF form, was distributed on May 18, 2010 to all 282 active MiCTA members located in Michigan, regardless of size. Recipients were instructed to complete and return the survey by May 28, 2010. Recipients were also provided with the most recent draft of the proposed rules.

The survey yielded 41 usable responses. Two responses were discarded because the respondent did not fill out the survey form. The effective response rate of the survey was 14.5%. The most frequently received responses appear in bold text.

Question #1 was designed to measure the respondent's awareness of the proposed rulemaking. 41 respondents answered this question.

1. Before you received this survey, were you familiar with the MPSC's proposed changes to Michigan's E911 identification requirements?

Yes: 31.7%

No: 65.9%

Don't Know: 2.4%

Questions 2, 3 and 4 were designed to help the respondent identify whether the proposed rule applied to their organizations.

2. Does your organization operate one or more multi-line telephone systems? (41 responses)

Yes: 97.6%

No: 2.4%

Don't Know

3. Does your organization occupy multiple buildings that share a single street address? (41 respondents)

Yes: 39%

No: 58.5%

Don't Know: 2.4%

4. Are any of your buildings greater than 40,000 square feet? (41 respondents)

Yes: 82.9%

No: 12.2%

Don't Know: 2.4%

Question 5 was designed to test the respondent's current state of E-911 readiness.

5. Does each telephone line in your current system fully comply with the new MPSC E911 rules? (41 respondents)

Yes: 14.6%

No: 58.5%

Don't Know: 26.8%

Question 6 was designed to determine the respondent's willingness or ability to comply with the regulation prior to its effective date.

6. If your system is not compliant, will your system be compliant by December 31, 2011? (39 respondents)

Yes: 42.5%

No: 10%

Don't Know: 42.5%

No Response: 5%

Question 7 was designed to determine the financial impact of the proposed rule. (40 respondents)

7. Will your organization incur any significant expense to comply with this rule?

Yes: 41.5%

No: 14.6%

Don't Know: 41.5%

No Response: 2.4%

Question 8 was designed to indicate that the PSAP exception to the rule will apply only if an organization provides its own first-response police, fire and EMS services. The one respondent who indicated that her organization has a private PSAP may not be clear on how emergency calls are routed, based upon the type of organization she was responding for.

8. Are emergency calls from your organization routed directly to your city/county 911 or does your organization have a private PSAP that provides police, fire and EMS services (all three) directly to your organization? (39 respondents)

County 911: 97.4%

Private PSAP: 2.6%

Don't Know: 0%

RESPONSE DEMOGRAPHICS

K-12 Education: 46.3% (19)

Higher Education: 29.3% (12)

Health Care: 14.6% (6)

Non-profit: 7.3% (3)

Government: 2.4% (1)

CONCLUSIONS:

- Approximately 2/3 of MiCTA members do not know of the proposed E-911 rulemaking, despite the fact that it applies to the majority of MiCTA members.
- Most MiCTA members are not currently compliant with the proposed rule and will have to address the requirements within the next 18 months.
- The majority (52.5%) of MiCTA members will not be or do not know if they will be compliant when the new regulation takes effect.
- Significantly, only 14.6% of MiCTA members **will not** incur significant costs to comply with the rule. 41.5% of respondents will positively incur significant costs and 41.5% currently do not know if they will incur significant costs to comply with the proposed rule.

- Generally, respondents do not receive emergency services from a private provider. This is significant only because it indicates conclusively that even the largest university members do not qualify for the exception established by the rule and therefore will be required to comply.
- All respondents, regardless of their compliance status, indicated that they wanted to receive additional information on the rulemaking process from MiCTA.

MEMORANDUM

April 12, 2011

To: Tim von Hoff
John Sundstrom

From: Victoria Valley

RE: E911 Survey Results 2010 and 2011

Accompanying this memorandum are the results from the 2010 and 2011 E911 survey. The survey was an eight-question instrument designed to determine:

- Awareness of administrative rulemaking regarding E-911 services in Michigan
- How many MiCTA members will be affected by the proposed rulemaking
- The status of compliance with the proposed rulemaking
- The likelihood that MiCTA members will be fully compliant by the effective date of the rule
- The likelihood that MiCTA members will incur significant cost to comply with the rule

The survey, issued in PDF form, was distributed on March 18, 2010 to 282 active MiCTA members and on March 28, 2011 to all active MiCTA members of the 260 k-12, Higher Education Institutions (179 or 69% of Michigan MiCTA members) and organizations (81 or 31% of Michigan MiCTA Members) located in Michigan, regardless of size. Recipients were instructed to complete and return the survey by May 28, 2010 and April 8, 2011 respectively. Recipients were also provided with the most recent draft of the proposed rules.

The surveys yielded 99 usable responses. Five responses were discarded because the respondents did not send the completed survey form and/or sent the survey in a format that couldn't be opened. The effective response rate of the survey was 22.3% (22%). There were 3 respondents that submitted a survey in 2010 and 2011. The 2011 survey results were compiled for this survey report (96 total respondents) for the 3 respondents that submitted a survey in 2010 and 2011. The most frequently received responses appear in bold text.

Question #1 was designed to measure the respondent's awareness of the proposed rulemaking. 96 respondents answered this question.

1. Before you received this survey, were you familiar with the MPSC's proposed changes to Michigan's E911 identification requirements?

Yes: 60%

No: 40%

Don't Know: 0%

Questions 2, 3 and 4 were designed to help the respondent identify whether the proposed rule applied to their organizations.

2. Does your organization operate one or more multi-line telephone systems? (96 responses)

Yes: 72%

No: 26%

Don't Know: 2%

3. Does your organization occupy multiple buildings that share a single street address? (96 respondents)

Yes: 42%

No: 56%

Don't Know: 2%

4. Are any of your buildings greater than 40,000 square feet? (96 respondents)

Yes: 81%

No: 13%

Don't Know: 6%

Question 5 was designed to test the respondent's current state of E-911 readiness.

5. Does each telephone line in your current system fully comply with the new MPSC E911 rules? (96 respondents)

Yes: 16%

No: 63%

Don't Know: 21%

Question 6 was designed to determine the respondent's willingness or ability to comply with the regulation prior to its effective date.

6. If your system is not compliant, will your system be compliant by December 31, 2011? (94 respondents)

Yes: 32%

No: 16%

Don't Know: 51%

No Responses (2010): 1%

Question 7 was designed to determine the financial impact of the proposed rule.
(95 respondents)

7. Will your organization incur any significant expense to comply with this rule?

Yes: 57%

No: 12%

Don't Know: 29%

No Responses (2010): 2%

Question 8 was designed to indicate that the PSAP exception to the rule will apply only if an organization provides its own first-response police, fire and EMS services. The one respondent who indicated that her organization has a private PSAP may not be clear on how emergency calls are routed, based upon the type of organization she was responding for.

8. Are emergency calls from your organization routed directly to your city/county 911 or does your organization have a private PSAP that provides police, fire and EMS services (all three) directly to your organization? (94 respondents)

County 911: 95%

Private PSAP: 2%

Don't Know: 3%

2010 RESPONSE DEMOGRAPHICS

K-12 Education: 46.3% (19)

Higher Education: 29.3% (12)

Health Care: 14.6% (6)

Non-profit: 7.3% (3)

Government: 2.4% (1)

2011 Total Survey DEMOGRAPHICS - Response DEMOGRAPHICS

K-12 Education: 49% (127) - - **71% (41)**

Higher Education: 20% (52) - - **19% (11)**

Health Care, Non-profit and Government: 31% (81) - - **10% (6)**

CONCLUSIONS:

- Approximately 60% of MiCTA members do not know of the proposed E-911 rulemaking, despite the fact that it applies to the majority of MiCTA members.

- Most MiCTA members, 84%, are not currently compliant with the proposed rule and will have to address the requirements within the next 18 months.
- The majority 84% (63% + 21%) of MiCTA members will not be or do not know if they will be compliant when the new regulation takes effect.
- Significantly, only 12% of MiCTA members **will not** incur significant costs to comply with the rule. 57% of respondents will positively incur significant costs and 29% did not know if they will incur significant costs to comply with the proposed rule. 2% of the 2010 MiCTA members survey respondents did not answer question #7.
- Generally, respondents do not receive emergency services from a private provider (2%). This is significant only because it indicates conclusively that even the largest university members do not qualify for the exception established by the rule and therefore will be required to comply.
- All respondents, regardless of their compliance status, indicated that they wanted to receive additional information on the rulemaking process from MiCTA.

Company Name	Email	First Name	Last Name	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Avondale Schools School District	JOHN.PAGE@Avondale.k12.mi.us	John	PAGE	2	1	2	3	1	1	1	A
Andrew University	hamstra@andrews.edu	Dan	Hamstra	1	1	1	1	2	1	1	A
Cedar Springs Public Schools	krysta.lilly@cedarsprings.org	Krista	Lilly	1	1	1	1	2	3	1	A
Michigan State University	carpente@pilot.msu.edu	Jeff	Carpenter	1	1	1	1	2	2	1	A
Oakland ISD	gerry.hollander@Oakland.k12.mi.us	Gerry	Hollander	1	1	1	1	2	2	1	A
Pontiac Academy	patrick.boynton@academy.org	Robert	Patrick	1	1	1	1	2	2	1	A
Pottersville Public Schools	tysonm@pwpss.org	Tony	Musmer	1	1	1	1	2	3	1	A
Southwestern Michigan College	hyoung@swmich.edu	Ron	Young	1	1	1	1	2	3	1	A
Spring Arbor University	Kevin.Schultz@saros.edu	Kevin	Schultz	1	1	1	1	2	3	1	A
Southfield Public Schools	colliganm@southfield.k12.mi.us	Merri Lynn	Colligan	1	1	1	3	2	3	1	A
Kalamazoo Public Library	gary@kpl.org	Gary	Green	1	1	2	1	2	2	1	A
MCESA k-12	james@mcesa.k12.mi.us	James	Mallory	1	1	2	1	2	3	1	A
Capitaw Township Community Schools	elliott@ctcs.org	Steve	Elliott	1	1	2	1	2	3	1	A
Teshiva Beth Yehudah	mayerfeld@tby.org	Eli	Mayerfeld	1	1	2	1	2	3	1	A
Bear Lake Schools	jeff@bearschools.org	Jeff	Kamalowski	2	1	1	1	2	3	1	A
Byron Area Schools	ebner@byron.k12.mi.us	Pam	Ebner	2	1	1	1	2	2	1	A
Calvin College & Seminary	myers@calvin.edu	Robert	Myers	2	1	1	1	2	3	1	A
Kaivea Norman Dickson Public Schools	kamalowski@norman-dickson.org	Jeff	Kamalowski	2	1	1	1	2	3	1	A
Lawrence Tech University	butler@ltu.edu	Harry	Butler	2	1	1	1	2	3	1	B
Rochester Community Schools	jeffrey.mordner@rochester.k12.mi.us	Jeffrey	Mordner	2	1	1	1	2	2	1	A
Northpointe Behavioral Healthcare Services	jeff@nbs.org	Josef	Peic	2	1	1	2	2	2	1	A
Alma Public Schools	scott@alma.net	Scott	Owen	2	1	2	1	2	3	1	A
Clare Public Schools	terry.bond@clare.k12.mi.us	Terry	Bond	2	1	2	1	2	2	1	A
Harrison Community Schools	jacob.sullivan@harrisonschools.com	Jacob	Sullivan	2	1	2	1	2	2	1	A
North Branch Area Schools	jeff@nbarea.org	Jeff	Drynton	2	1	2	1	2	3	1	A
Reed City Area Public Schools	jeff@reedcity.k12.mi.us	Paul	Lewis	2	1	2	1	2	2	1	A
Reese Public Schools	mark@reese.k12.mi.us	Mark	Nelson	2	1	2	1	2	2	1	C
Romeo Community Schools	mark@romeo.k12.mi.us	Mark	Nelson	2	1	2	1	2	3	1	A
South Haven Public Schools	steve@shps.org	Steve	Miles	2	1	2	1	2	3	1	A
St. Paul the Apostle School	julie.palmer@stapaulschools.com	Julie	Palmer	2	1	2	1	2	3	1	A
Mt. Pleasant Public Schools	steve.woloszyn@mtpleasant.k12.mi.us	Steve	Woloszyn	2	1	2	1	2	3	1	A
Manover-Horton Schools	dan@mhhsd.k12.mi.us	Dan	Marvin	1	1	1	1	3	3	1	A
Gull Lake Community Schools	brian@brian.k12.mi.us	Linda	Brian	2	1	1	1	3	3	1	A
Quartermaine Community Schools	quartermaine@quartermaine.org	Chris	Quartermaine	2	1	2	1	3	3	1	A
Hazel Park Community Schools	ryan.stefanski@hazelpark.k12.mi.us	Ryan	Stefanski	2	1	2	1	3	3	1	A
LAUREL MANOR	diana@laurelmanor.com	Diana	Panko	2	3	2	2	3	2	1	C
Grand Valley State University	felker@gu.edu	Jan	Felker	1	1	1	1	1	1	2	A
Northwood University	brewster@northwood.edu	Paul	Brewster	1	1	1	1	1	3	2	A
Oakland County	stephens@oakcountymichigan.net	Troy	Stephens	2	1	1	1	1	3	2	A
NCC	scott@ncc.org	Scott	Stepanski	2	1	2	2	1	1	2	A
Oakland County Community Mental Health Authority	peter.mouhot@occmha.org	Peter	Mouhot	2	1	2	2	1	3	2	A
Sault Area Public Schools	peter.mantel@saup.k12.mi.us	Peter	Mantel	2	1	2	3	1	1	2	A
City of Portland	thomas.dempsey@portland-michigan.org	Thomas	Dempsey	1	1	2	2	2	2	2	A
Legislative Service Bureau Michigan	jane.white@lsbmi.org	Jane	White	1	1	2	3	2	1	2	A
Marysville Public School District	rutalie.mice@psdmi.org	Mike	Rutalie	2	1	2	1	2	1	2	A
Clare-Gladwin RESD	kevin.kirkbusch@cgresd.net	Kevin	Kirkbusch	2	1	2	1	3	1	2	A
Madonna University	egiesler@madonna.edu	Eleanor	Geisler	1	1	1	1	1	3	3	A
C.O.D.R. ISD	dozzi@ms3access.com	Ruggero	Dozzi	1	1	3	2	1	1	3	A
City of Rochester Hills	vince@rochesterhills.org	Vince	Foisy	1	1	1	1	2	3	3	A
Farmington Public Schools	TIFFANY.GENTILE@farmington.k12.mi.us	TIFFANY	GENTILE	2	1	2	2	2	1	3	A
Clare-Gladwin RESD	ken.chinevere@cgresd.net	Ken	Chinevere	2	1	1	1	3	3	3	A
Muskegon Community College	jason.miller@muskegoncc.edu	Jason	Miller	2	1	1	1	3	1	3	A
Onekama Consolidated School	bruce.peabody@onekama.org	Bruce	Peabody	2	1	1	1	3	1	3	A
Pinconning Area Schools	jay.bosworth@pasd.org	Jay	Bosworth	2	1	1	1	3	3	3	C
Muskegon Area ISD	tim.brown@muskegonisd.org	Tim	Brown	2	1	2	1	3	3	3	A
Cleary University	dave.bowers@cleary.edu	Dave	Bowers	2	1	2	2	3	3	3	A
MANISTEE?? (CASMAN)	cameron@manistee.org	Cameron	Clark	2	1	2	2	3	3	3	A
	patrick@casman.com	lean		2	1	2	3	3	1	1	A

K = 4,000;
\$5,000

9:15 AM
04/12/11

MiCTA
Customer Contact List
April 12, 2011

Customer	State
Adrian College	MI
Allegan Area ESA	MI
Alma College	MI
Alpena Community College	MI
Altam	MI
Andrews University	MI
Arts Alliance	MI
Ashley Community Schools	MI
Baker College - Flint	MI
Bangor Public Schools	MI
Barry ISD	MI
Bath Community Schools	MI
Bay-Arenac ISD	MI
Bear Lake Schools	MI
Beaver Island Community Schools	MI
Bellevue Community Schools	MI
Brown City Community Schools	MI
C.O.O.R. ISD	MI
Cathoun ISD	MI
Calvin College	MI
Camey-Nadeau Public School	MI
Cass City Public Schools	MI
Cassopolis Public Schools	MI
Cedar Springs Public Schools	MI
Centerville Public Schools	MI
Central Michigan University	MI
Central Montcalm Public School	MI
Cesar Chavez Academy Elementary	MI
Cesar Chavez Academy Intermediate	MI
Cesar Chavez High School	MI
Cesar Chavez Middle School	MI
Chandler Park Academy Elementary	MI
Chandler Park Academy MS/HS	MI
Charlevoix-Emmet ISD	MI
Charlevoix Public Schools	MI
Chatfield School	MI
Clinton County RESA	MI
College for Creative Studies	MI
Coloma Community Schools	MI
Community Homeworks	MI
Cornerstone University	MI
Crawford AuSable School District	MI
Creative Learning Academy	MI
Crossroads Charter Academy	MI
Croswell Lexington School	MI
Delta-Schoolcraft ISD	MI
Delta College-01	MI
Detroit Community Schools	MI
Detroit Cristo Rey High School	MI
Education Freedom Fund	MI
Edwardsburg Public Schools	MI
Farmington Public Schools	MI
Fennville Public Schools	MI
Ferris State University	MI
Gaylord Community Schools	MI
Genesee ISD	MI
GLACIER of Michigan	MI
Gogebic Community College	MI
Grand Valley State University - 01	MI
Gratiot-Isabella RESD	MI
Grattan Academy Elementary	MI
Grattan Academy High School	MI
Great Lakes Christian College	MI
Greater Muskegon Catholic School	MI
Grosse Ile Twp Schools	MI
Grosse Pointe Public Schools	MI
Hale Area School	MI
Harbor Beach Community Schools	MI
HEART Academy	MI
Henry Ford Community College	MI
Hesperia Comm. Schools	MI
Hillsdale College	MI
HomeWorks Tri-County Electric Coop	MI
Hope College - 01	MI
Huron ISD	MI
Interlochen Center for the Arts	MI
Ionia County ISD	MI
Iron Mountain Public Schools	MI

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04/12/11

MICTA
Customer Contact List
April 12, 2011

Customer	State
Kalamazoo College	MI
Kalamazoo Public Library	MI
Kalamazoo RESA	MI
Kalamazoo Valley CC	MI
Kaleva Norman Dickson School district	MI
Kellogg Community College	MI
Kent ISD	MI
Kirtland Community College	MI
Lake Superior State University	MI
Landmark Academy	MI
Lansing Community College	MI
Lawrence Public Schools	MI
Lansawee/Monroe Technology Consortium	MI
Lewis Cass ISD	MI
Livonia Public Schools	MI
Lutheran High School Association	MI
Macomb Community College - Warren	MI
Macomb ISD	MI
Madonna University	MI
Manistee ISD	MI
Manistique Area Schools	MI
Maple Valley Schools	MI
Marvin L Winans Academy of Performing Art	MI
Marvin Winans Academy of Performing Art	MI
Mecosta-Oshtemo ISD	MI
Mendon Community Schools	MI
Meridian Public Schools	MI
Merritt Academy	MI
MI Comm Coll Assoc	MI
Michigan Association of Non Public School	MI
Michigan Health Academy	MI
Michigan State University - 01	MI
Michigan Virtual University-01	MI
Midland County ESA	MI
Milan Area Schools	MI
Monroe County ISD	MI
Montague Area Public Schools	MI
Montcalm Area ISD	MI
Mott Community College	MI
Muskegon Area ISD	MI
Newaygo County RESA	MI
North Central Area Schools	MI
North Central Michigan College	MI
North Muskegon Public Schools	MI
Northern Michigan University	MI
Northwest Academy	MI
Northwest School District	MI
Northwestern Michigan College	MI
Northwood University	MI
Oakland Community College	MI
Oakland International Academy Elementary	MI
Oakland International Academy High School	MI
Oakland International Academy Intermediate	MI
Oakland ISD	MI
Oakland University	MI
Oceana ISD	MI
Ottawa Area ISD	MI
Owosso Public Schools	MI
Paw Paw Public Schools	MI
Pinconning Area Schools	MI
Pontiac Academy for Excellence	MI
Portage Public Schools	MI
Portland Public Schools	MI
Pottsville Public Schools	MI
Reese Public Schools	MI
River Valley School District	MI
Rochester College	MI
Saginaw ISD	MI
Saginaw Valley State University-01	MI
Saranac Community Schools	MI
Schoolcraft College	MI
Shiawassee RESD	MI
Siena Heights University	MI
South Haven Public Schools	MI
Southfield Public Schools	MI
Southwestern Michigan Col	MI
Spring Arbor University	MI

9:15 AM
04/12/11

MICTA
Customer Contact List
April 12, 2011

Customer	State
St. Clair County Community College	MI
St. Johns Public Schools	MI
St. Joseph County ISD	MI
Starr Commonwealth	MI
Stephenson Area Public Schools	MI
Sturgis Public Schools	MI
Sunrise Education Center	MI
Thomas M Cooley Law School	MI
Traverse Bay Area ISD	MI
Tuscola ISD	MI
University of Detroit Mercy	MI
University of Michigan	MI
Van Andel Institute	MI
Van Buren ISD	MI
Walkerville Rural Communities Schools	MI
Walsh College	MI
Washtenaw Community College	MI
Wayne County Community College	MI
Wayne State University	MI
West Shore Community College	MI
Wexford-Missaukee ISD	MI
White Pine Academy	MI
Woodland School	MI
Yeshiva Beth Yehudah	MI

**STATE OFFICE OF ADMINISTRATIVE HEARINGS AND RULES
INTEROFFICE COMMUNICATION
TO THE MICHIGAN PUBLIC SERVICE COMMISSION**

TO: The Commission

FROM: Sharon L. Feldman

DATE: April 20, 2011

CASE NO. U-16439 (Commission's Own Motion, Re Multiline Telephone Systems)

HEARING DATE(S): April 19, 2011

APPEARANCES: N/A

The above-referenced matter is hereby transmitted to the Commission for its consideration. On April 19, 2011, in accordance with the Commission's February 25, 2011 order, a public hearing was held to provide members of the public with an opportunity to comment on proposed rules governing Multiline Telephone Systems. At the hearing, four people commented on the proposed rules: Peter Baker (Pro-Tel); Tim Von Hoff (MiCTA); Dan Hamstra (Andrews University); and Jeff Carpenter (Michigan State University).

The period for written comments runs through May 10, 2011.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's
own motion, to promulgate rules
governing multiline telephone
systems.

Case No. U-16439

Volume 1

PUBLIC HEARING

Proceedings held in the above-entitled matter
before Sharon L. Feldman, J.D., Administrative Law
Judge with SOAHR, at the Michigan Public Service
Commission, 6545 Mercantile Way, Room A, Lansing,
Michigan, on Tuesday, April 19, 2011, at 9:04 a.m.

- - -

REPORTED BY: Lori Anne Penn (CSR-1315)

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I N D E X

COMMENTS BY:

PAGE

Peter Baker

4

Tim VanHoff

6

Dan Hamstra

8

Jeff Carpenter

14

1 Lansing, Michigan

2 Tuesday, April 19, 2011

3 At about 9:04 a.m.

4 - - -

5 (Hearing commenced pursuant to due notice.)

6 JUDGE FELDMAN: All right. On the
7 record. Good morning, all. This is the time and place
8 set for a public hearing in Michigan Public Service
9 Commission Case No. U-16439, entitled: In the matter, on
10 the Commission's own motion, to promulgate rules
11 governing multiline telephone systems. This is the,
12 pursuant to notice, opportunity the Commission has
13 provided to give the public an opportunity to comment on
14 the proposed rule revisions.

15 For the record, my name is Sharon
16 Feldman, I'm an administrative law judge with the State
17 Office of Administrative Hearings and Rules.

18 Let me note that the docket in this case
19 reflects the publication of the notice of hearing in The
20 Oakland Press, The Grand Rapids Press and The Mining
21 Journal. Let me also note that the Commission has
22 provided that written comments may be filed by May 10,
23 2011, at 5:00 p.m., and directed that written comments
24 should reference the docket number, which is U-16439.

25 I have several names on some sign-in
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1 sheets of people that I believe want to make comments, so
2 let me start calling people. When I call your name, if
3 you can come up here, or if you're not comfortable taking
4 this witness stand, just take this first chair up here so
5 that the court reporter can more easily take down your
6 remarks.

7 Mr. Peter Baker.

8 PETER BAKER: Good morning.

9 JUDGE FELDMAN: Good morning. Any time
10 you're ready.

11 PETER BAKER: My name is Peter Baker, I'm
12 president of Pro-Tel, Incorporated. We've been in --
13 I've been in the phone business since 1966, and I started
14 Pro-Tel in 1975. I have been installing and maintaining
15 9-1-1 systems since 1989, so I'm very familiar with the
16 9-1-1 systems, at least as far as the customer premise
17 equipment, and also very familiar with the network and
18 all the problems involved with it.

19 The new rules that I see being proposed
20 in its present form, in my opinion, are doomed to
21 failure. These rules will cover any phone system that
22 has more than one line, even in residential atmospheres.
23 It restricts the type of 9-1-1 service -- I mean not
24 9-1-1 service -- phone service that you'll be able to get
25 from the telephone companies. Today, to the best of my

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1 knowledge, there's only one type of service, which is an
2 ISDN Primary Rate Interface, that is available that will
3 be able to provide this type of service. In many cases,
4 the phone systems that are out there, matter of fact, my
5 opinion, the vast majority of them will have to be
6 replaced, they're not capable of providing these, to say
7 nothing about the cost, the monthly cost involved to the
8 consumer or the business that it involves in providing
9 this new service.

10 The other problem, one of the other
11 problems that I have with this, the rules, is the
12 database that's going to have to be maintained to provide
13 this type of service. I don't see any rules or
14 regulations that say how this database is going to be
15 maintained, how it's going to be updated, and what the
16 costs are going to be. It's absolutely -- there's
17 nothing.

18 The effective date of this is December 31
19 of 2011, which is absolutely ridiculous. I mean by the
20 time that they put this into effect, maybe we're going to
21 have six months to upgrade all the possible phone systems
22 out there that would need upgrading to comply with this,
23 to say nothing about how they're going to notify all
24 these businesses that their equipment's got to be
25 replaced so they comply with the new rules, to say

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1 nothing about the cost.

2 The other thing that concerns me is the
3 fact that who's going to determine whether you're in
4 compliance with this or not and who's going to go around
5 and check this equipment; and it's very possible that
6 they could just pay the penalty that's in Rule 6 and end
7 up cheaper than trying to comply with these rules. And
8 that's my thoughts on it.

9 JUDGE FELDMAN: All right. Thank you
10 very much for coming this morning.

11 Tim VanHoff.

12 TIM VanHOFF: Good morning.

13 JUDGE FELDMAN: Good morning.

14 TIM VanHOFF: I'm here representing
15 MiCTA, I'm the chief operating officer for MiCTA, and
16 MiCTA is a nonprofit association, telecommunications
17 association.

18 I do have a question. We did conduct a
19 survey, which I'll be referring to. Is it permissible to
20 leave a copy of that survey with you?

21 JUDGE FELDMAN: Yes.

22 TIM VanHOFF: O.K. And we also have a
23 position paper, which I'm going to be essentially reading
24 from. I can leave that as well.

25 JUDGE FELDMAN: Thank you very much.

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1 TIM VanHOFF: MiCTA is a nonprofit
2 association of colleges, universities, K-12 school
3 systems, state and local government units, we have other
4 members as well. When the legislation was passed
5 originally, we were very interested because we realized
6 that it would impact our membership, and we wanted to
7 discover exactly where our members were as it relates to
8 their capability of implementing solutions.

9 Consequently, most of our members as I
10 identified are impacted by the deadline that's looming,
11 December 31, 2011. Even though the deadline's only a few
12 months away, there are yet to be rules promulgated as it
13 relates to this legislation and the implementation.
14 Consequently, because of the time it would take to comply
15 and the lack of rules, MiCTA believes that it is
16 necessary to delay the implementation by either amending
17 the legislation, or to extend the deadline by MPSC rule.

18 The issue arises because in 2007 the
19 legislature amended the 9-1-1 law to require any users of
20 multiline telephone systems to install the necessary
21 equipment and software to provide specific locations on
22 an E-9-1-1 call no later than December 31, 2011.

23 And for the sake of saving time this
24 morning, I will simply reference the two surveys that we
25 conducted; one last year, and then we wanted to see where

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1 people were again this year. The statistics are all in
2 the documentation.

3 We're concerned because there's a
4 significant percentage of our membership in the State of
5 Michigan that is going to have a difficult time or find
6 it impossible to comply with the law, so it is a very
7 serious situation. The number of institutions that were
8 surveyed, again, are included in this, so I'd like just
9 to -- who do I give this to, you or the recorder?

10 JUDGE FELDMAN: We'll give it to the
11 court reporter, and that will make sure that it all gets
12 kept together with the file.

13 TIM VanHOFF: O.K. And I will stay, so
14 if there are any opportunities for further comments or
15 questions based on some of the other testimony, I'll be
16 available.

17 JUDGE FELDMAN: All right. Thank you
18 very much.

19 TIM VanHOFF: Thank you.

20 JUDGE FELDMAN: Mr. Dan Hamstra. And,
21 Mr. Hamstra, that's H-a-m-s-t-r-a?

22 DAN HAMSTRA: That's correct. If you're
23 from western Michigan, you better know how to spell Dutch
24 names.

25 My name is Dan Hamstra, I'm the director
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1 of telecommunications for Andrews University, which is in
2 Berrien Springs, Michigan. And I just want to make a
3 couple comments just for clarification.

4 We're talking about, primarily about
5 E-9-1-1, enhanced 9-1-1, and what E-9-1-1 adds to the
6 traditional 9-1-1 system. For those that are familiar
7 with how the technology operates, E-9-1-1 is used when a
8 caller can not adequately describe what's going on in
9 their situation. As an example, if I'm at 123 Main
10 Street based on where I'm calling from my telephone, but
11 over the phone I tell the dispatcher but my neighbor at
12 124, looks like there's a fire at their house, or I saw a
13 half mile down the street something going on, the
14 dispatcher will dispatch to the location I describe, not
15 to my home address or the address that shows up based on
16 the call. It's for that reason that the majority of
17 9-1-1 calls, the dispatch is based on what the caller is
18 saying, and it is only when the dispatcher can not
19 adequately describe their location, either because they
20 can't talk, don't speak English, too overcome with what
21 the situation to describe, that then the dispatcher, as a
22 method of last resort shall we say, will dispatch to the
23 location that comes up based on the automated display,
24 and that's what E-9-1-1 is all about, extending what we
25 already expect in our home environments if we can't make

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1 a call or if a two year old happens to dial 9-1-1,
2 extending that to the workplace, the hospitals, the
3 places that use an MLTS, multiline telephone system.

4 And with that in mind, it's, I think most
5 of the industry agrees that the safest place to make a
6 9-1-1 call from is a wired landline phone. You get into
7 voice over IP, cellular service, if you can describe,
8 it's just as safe as a wired phone, but if you can't
9 describe where you're at, you don't know, you're in a
10 strange place and you just know something weird is going
11 on, that is where E-9-1-1, enhanced 9-1-1, comes into
12 play, and that's specifically what we're talking about
13 today, on a multiline telephone system. That's what
14 E-9-1-1 in an MLTS environment adds to what we already
15 expect.

16 Cellular, the cellular industry was faced
17 with this a year ago because the FCC and other entities
18 say we have to provide better information for the
19 location telephone calls. Well, the cellular industry,
20 quite frankly, there's better lobbyists than a whole
21 bunch of us multiline telephone system users; and they
22 said, well, here's what the technology is capable of
23 doing, we can incorporate this into our equipment, and
24 they set standards for how specific you had to be able,
25 to automatically be able to identify the location of the

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1 call.

2 My concern with the requirements now is
3 you're setting standards, as the previous gentleman
4 commented, that there's a lot of equipment out there that
5 can not give you the specific location, so that equipment
6 will have to be replaced, in some cases can be upgraded,
7 in many cases, especially for smaller systems, it will
8 have to be replaced. And if you're not very careful with
9 your definition, particularly of the term specific
10 location, you're going to write a definition that is
11 technically all but impossible.

12 Now, I will take issue with a comment of
13 the previous gentleman, he said if you have a multiline
14 telephone system in your house, that you would come under
15 this law. So long as your house is more than 7,000
16 square feet, that might be true, but mine is not. So
17 it -- so but if you're not careful, and I said this
18 actually in preliminary hearings -- and I see Karen
19 smiling, maybe she remembers -- if you're not careful,
20 you're going to write this so that if I move my cordless
21 phone from my bathroom to my kitchen, I'm going to have
22 to be able to make the 9-1-1 call automatically identify
23 when I'm in my bathroom versus my kitchen. The rules as
24 presented do not presently get that specific with the
25 definition of specific location, but that is my concern

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1 is that if that definition changes, that there are
2 potential issues.

3 One place right now, at least in my
4 reading, I'm not an attorney, I'm a technologist, that
5 does pose a problem is, take for example, if I'm a
6 nursing home operator, I do not have on-site 24-hour
7 emergency support, fire, other safety personnel on
8 campus, but I want to equip my staff with cordless phones
9 as they go from room to room making, you know, providing
10 services to the occupants of my nursing home. As I read
11 it now, I better get rid of those cordless phones,
12 because if they're on the A wing or the C wing or room X,
13 room Y, and when they make a 9-1-1 call from that
14 cordless phone, it can not automatically be identified
15 what part of the facility they're in, they will be not in
16 compliance. If we equip them with cell phones, which
17 might give you within half a mile where the call was
18 made, depending on the circumstances, and in fact indoors
19 probably will not work because GPS location in cell
20 phones usually does not work in indoors, they will be in
21 compliance. And that is my concern is depending on how
22 you write the definition of specific location on some of
23 the things you do, you might actually put some
24 institutions into a position of less safety for their
25 employees or their occupants. Why? Because the

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1 situation I just outlined, the regulation said --
2 cordless phones, I at least could have gotten the street
3 address to have known where they were. If they couldn't
4 describe, I could get it automatically, because if they
5 can describe it, it doesn't matter what the automatic
6 identification says. But now because of regulation, it
7 said, but these new WiFi-based or other technology phones
8 that are really great in hospitals and we see them in
9 Home Depot and all over the place now become potentially
10 in violation of our regulations. MLTS operators, such as
11 myself, might say, we can't use that, better get you a
12 cell phone, better get you a walkie-talkie, both of which
13 are less safe when you're making an emergency call than
14 some other technology. And that is my real concern,
15 particularly with the language of specific locations.

16 I have one other comment about specific
17 verbiage presently under 484.904, Rule 4, paragraph 1.
18 The term building maintains and building is serviced,
19 there's this constant reference to building. This is a
20 particular situation, I don't think it's unique to our
21 institution, but many building campuses, office campuses,
22 might have a central security dispatch or central
23 response dispatch that might service multiple buildings,
24 but from one phone system, one MLTS, and so long as the
25 rules are interpreted to allow multiple buildings, you

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1 know, to meet an exemption based on this -- I believe the
2 State of Michigan, I think there was a gentleman in the
3 preliminary comment period that made similar comment
4 about some of the state agencies even and how the
5 security and safety is handled at state facilities -- but
6 we have many, you know, maybe a complex that's a
7 manufacturing complex, an office campus or a school
8 campus, public school or small university such of ours,
9 that there might be a central dispatch for a group of
10 buildings, not just a single building. And so to me it
11 feels slightly inconsistent that in some places we are
12 talking about buildings that seem to be the focus, and
13 then in other cases we are making allowances for multiple
14 building campuses.

15 Thank you very much for your time. I
16 appreciate the opportunity to participate. And I want to
17 thank Karen in particular for some of the work she put
18 into preliminary things, because there's a few of us that
19 have met a few times on this topic and we really
20 appreciate again an opportunity to participate.

21 JUDGE FELDMAN: Thank you very much.

22 Jeff Carpenter.

23 JEFF CARPENTER: Any clarification on
24 spelling?

25 JUDGE FELDMAN: No. I think it's
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1 p-e-n-t-e-r.

2 JEFF CARPENTER: That's correct. My name
3 is Jeff Carpenter, I'm manager of engineering for
4 Michigan State University Telecom Services. And once
5 again, appreciate the opportunity to participate in the
6 initial ad hoc hearings, as the previous gentleman
7 stated.

8 I just have three points. For the
9 record, Michigan State University has been working to
10 ensure that all of our systems are E-9-1-1 compliant.
11 We've been working on this since 2004, prior to even
12 hearing about this particular legislation and the
13 subsequent rulemaking. But the situation that we are in
14 is that we currently have 68 buildings that are fully
15 compliant, an additional 88 buildings are not, and it is
16 very unlikely that we can meet any deadline in the next
17 six months due, not just due to finances, but the fact
18 that you can not simply convert 88 buildings to
19 compliance in that short of time given the resources
20 available. But Michigan State is certainly committed to
21 accessible E-9-1-1.

22 Our representation through MiCTA -- we
23 appreciate MiCTA's organization and their ability to send
24 out surveys to the nonprofit world. An interesting
25 situation is that I was recently at a user group for
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1 public, for non-, mainly nonpublic organizations, so
2 private sector businesses did not have a very good
3 knowledge this even exists, so the MiCTA organization is
4 communicating with nonprofits through their survey that
5 Mr. VanHoff dropped off a few moments ago. But in the
6 private sector, there's very little knowledge of that
7 this is actually happening, probably much more knowledge
8 in the public sector.

9 One thing I would like to mention about
10 specific location, there are some written comments being
11 submitted by Avaya. Avaya is a major manufacturer of
12 telecommunication equipment. And their comments, and I
13 will support their comments as submitted to the public
14 record by the deadline, having to deal with emergency
15 response location. Their definition helps further
16 clarify what specific location could be. That's an
17 important part about this rulemaking procedure. I
18 understand that the Public Service Commission can not
19 change the date, that's been made very clear to a lot of
20 us in the ad hoc process, but what you can do is help to
21 clarify specific location, and the comments submitted by
22 Avaya, which is the manufacturer of the service that
23 Michigan State operates, has some additional detail about
24 emergency response location that I think might help
25 clarify the specific location definition. It's something

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1 that I was just recently made aware of, but I think you
2 should definitely heed those comments carefully and look
3 at that, because I think it will help clarify things and
4 tie it back to a more national dialogue. There are
5 certainly national-level things happening through NENA
6 and other federal legislation, and to have Michigan's
7 specific location definition mirror more closely the
8 national and what's being done in other states I think
9 would be very advantageous, and Avaya's comments will I
10 think speak to that.

11 Just one final thing I'd like to mention,
12 and it's essentially outside of this rulemaking process,
13 but I've been encouraged by my representation of Michigan
14 State to announce that, you know, Michigan State, as well
15 as some other partners, are pursuing legislation outside
16 the rulemaking process at the state legislature, both in
17 the senate and the house, to introduce a five-year
18 implementation period of this law, in other words, amend
19 the current law, outside of the Public Service Commission
20 process, that is in the works. I can not announce a bill
21 number at this time, but it is actively under -- it's
22 actively being worked on in both the Senate and the House
23 at this very moment. And what that will do is say that
24 people that have systems that are technically capable of
25 meeting this rulemaking should comply immediately.

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1 We certainly believe in emergency
2 communications and they should apply immediately, and by
3 immediately I believe we have put in a 12-month
4 implementation period from the time the rules are
5 promulgated. Those people that do not have systems that
6 are technically capable, they just simply can't do it,
7 they can't support ISDN PRI, as Mr. Baker mentioned, or
8 other types of services, would have a 60-month or a
9 5-year implementation window. That closely mirrors what
10 the state's own 9-1-1 Commission recommended to the
11 legislature in 2006.

12 Prior to this law being actually created,
13 prior to this whole rulemaking process, the state's own
14 9-1-1 Commission, headed by the Michigan State Police,
15 did recommend a 60-month implementation period. Now, 60
16 months is from the time rules are promulgated, not from
17 the time the law is created. That was in 2007. Action
18 has taken way too long. And so we certainly believe in
19 implementation, but we believe in a delayed process and
20 understand that that really needs to happen outside of
21 the Public Service Commission process, which is why we
22 are pursuing legislation, and I've been authorized to
23 enter that into the public record as well.

24 So with that said, I will also introduce
25 written comments on behalf of Michigan State prior to the
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1 deadline. And to clarify, that was the 10th of May?

2 JUDGE FELDMAN: May 10th.

3 JEFF CARPENTER: May 10th. And we'll
4 enter those into the record. One thing we'll enter into
5 the record will actually be the draft of law that we are
6 moving through the legislature at this time into the
7 public record. So I appreciate the comments, the ability
8 to comment, and thank you very much.

9 JUDGE FELDMAN: Thank you very much.

10 Mr. Carpenter is the last person I have
11 on my list who indicated that they wished to make public
12 comments, but let me ask, is there anybody else who wants
13 to make a comment this morning?

14 Mr. Totoraitis, did Staff want to place
15 any comments on the record?

16 MR. TOTORAITIS: I don't believe we do
17 have any comments. Thank you.

18 JUDGE FELDMAN: All right. Thank you,
19 all, very much for coming this morning. We are
20 adjourned.

21 (At 9:26 a.m., the public hearing adjourned.)

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C E R T I F I C A T E

I, Lori Anne Penn (CSR-1315), do hereby
certify that I reported in stenotype the proceedings had
in the above-entitled matter, that being Case No.
U-16439, before Sharon L. Feldman, J.D., Administrative
Law Judge with SOAHR, at the Michigan Public Service
Commission, 6545 Mercantile Way, Lansing, Michigan, on
Tuesday, April 19, 2011; and do further certify that the
foregoing transcript constitutes a true and correct
transcript of my stenotype notes.

Lori Anne Penn, CSR-1315
33231 Grand River Avenue
Farmington, Michigan 48336

Dated: _____

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